

RACHEL B. ABRAMS (Cal Bar No. 209316)  
 ADAM B. WOLF (Cal Bar No. 215914)  
**Peiffer Wolf Carr Kane Conway & Wise, LLP**  
 555 Montgomery Street, Suite 820  
 San Francisco, CA 94111  
 Telephone: 415.766.3544  
 Facsimile: 415.840.9435  
 Email: rabrams@peifferwolf.com  
 Email: awolf@peifferwolf.com

TIFFANY R. ELLIS (*Admitted PHV*)  
**Peiffer Wolf Carr Kane Conway & Wise, LLP**  
 2229 Trumbull St.  
 Detroit, MI 48216  
 Telephone: 313.210.1559  
 Facsimile: 415.840.9435  
 Email: tellis@peifferwolf.com

*Counsel for Plaintiff*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
 PASSENGER SEXUAL ASSAULT  
 LITIGATION

MDL No. 3084 CRB

**DECLARATION OF RACHEL B.  
 ABRAMS IN SUPPORT OF REPLY OF  
 MOTION TO WITHDRAW AS COUNSEL  
 FOR PLAINTIFF I.C.**

This Document Relates to:

*I.C. v. Uber Technologies, Inc., et al;*  
*3:25-cv-06382-CRB*

I, Rachel B. Abrams, declare:

1. I am an attorney in the law firm of Peiffer Wolf Carr Kane Conway and Wise, LLP. I am admitted to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.
2. Circumstances outside counsel's control—including the inability to reach Plaintiff I.C. and maintain consistent communication—have made continued representation impractical and unreasonably difficult.
3. The communication breakdown between attorney and client underscores the

1 impossibility of effective representation under current conditions.

2 4. A breakdown in communication and trust between attorney and client constitutes good  
3 cause for withdrawal, particularly where withdrawal will not prejudice other parties or  
4 delay proceedings.

5 5. Plaintiff I.C.'s failure to communicate with and provide necessary information to our  
6 firm has presented a circumstance covered by Rule 1.16(b)(4) of the California Rules of  
7 Professional Conduct. We are unable to meet discovery deadlines and otherwise  
8 prosecute her case without her input. Our withdrawal from the case has become  
9 necessary.

10 6. Under the California Rules of Professional Conduct 1.16(d), my firm has taken all  
11 reasonably available steps to avoid prejudice to the rights of Plaintiff I.C.

12 7. Our withdrawal from this case will not impact the timing or schedule of this litigation,  
13 and we have taken all reasonable steps possible to avoid prejudice to Plaintiff by  
14 informing her of her options and the consequences of failing to comply with case  
15 deadlines.

16 8. I understand that pursuant to Local Rule 11-5(b), leave to withdraw may be conditioned  
17 on our firm continuing to accept papers to forward to the client. We are able to accept  
18 this responsibility.

19 Executed this 25<sup>th</sup> day of November, 2025 in San Francisco, California.

20 /s/ Rachel B. Abrams  
21 Rachel B. Abrams

22 *Counsel for Plaintiff*  
23  
24  
25  
26  
27  
28